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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CLARENCE MADDOX
CLERK, USDC / SDFL / MIA

HENRY NARANJO and
MARLENE RAMIREZ,

CASE NO. 00-6022-CIV-LENARD
Magistrate Judge Turnoff

Plaintiffs,

v.

STEPHEN BYRON SMITH, and
PALMER JOHNSON, INC.,

Defendants.

AGREED MOTION TO CONTINUE SETTLEMENT CONFERENCE

COME NOW, the Defendant, PALMER JOHNSON, INC., by and through its undersigned attorneys, and files this Agreed Motion to Continue Settlement Conference and states as follows:

1. That on or about May 8, 2001, this claim was referred for a Settlement Conference to take place at the United States District Court, Southern District of Florida, on May 29, 2001, at 10:00 a.m.

2. However, the parties mediated this claim, pursuant to Court Order, on Friday, May 18, 2001, and at that time continued the mediation for 90 days, rather than have an impasse declared, so the parties could further explore certain issues and make strides toward settlement of the claim, if possible.

3. Therefore, it is the position of all the parties herein that since settlement opportunities continue be explored through the mediation process, that the Settlement Conference at this time will simply be a reiteration of the discussions which previously took place during the mediation, and will likewise be a strain on judicial resources.

6/1/01

4. That all of the parties herein are in agreement with this motion.

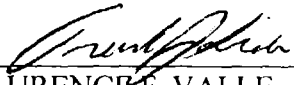
WHEREFORE, Defendant, PALMER JOHNSON, respectfully request that this court enter an order granting this Agreed Motion and allow the parties to continue the mediation conference currently scheduled for May 29, 2001 for ninety (90) days.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing motion has been furnished by mail this 24 day of May, 2001 to: **Manuel Valdes, Esquire**, Law Offices of Manuel Valdes, Attorneys for Plaintiffs, 910 Madrid Street, Coral Gables, Florida 33134; **F. David Famulari, Esquire**, Underwood, Karcher & Karcher, P.A., Co-Counsel for Plaintiffs, 2900 Southwest 28th Terrace, 6th Floor, Miami, Florida 33133; **John D. Kallen, Esquire**, Badiak, Will & Kallen, Attorneys for Stephen Byron Smith, 17071 West Dixie Highway, North Miami Beach, Florida 33160; and David L. Weber, Esquire, Pinkert Law Firm LLP, 454 Kentucky Street, P.O. Box 89, Sturgeon Bay, WI 54235-0089.

VALLE & CRAIG, P.A.
Counsel for Defendant,
PALMER JOHNSON, INC.
Dadeland Centre
Suite 1000
9155 South Dadeland Boulevard
Miami, Florida 33156
Telephone: (305) 373-2888
Fax: (305) 373-2889

By: _____


LAURENCE F. VALLE
Florida Bar No. 121382
FRANK J. SIOLI
Florida Bar No. 009652